IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
FTX TRADING LTD., et al., ¹	Case No. 22-11068 (JTD)
Debtors.	

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure and sections 102(1), 342 and 1109(b) of the United States Bankruptcy Code, 11 U.S.C. §§ 101, <u>et seq.</u>, Blank Rome LLP hereby appears as counsel to Fulcrum Distressed Partners Limited ("<u>Fulcrum</u>") in the above-captioned bankruptcy cases. Fulcrum hereby requests that all notices given or required to be given in these cases and all papers served or required to be served in these cases, be given to and served upon the following:

Josef W. Mintz, Esq. **BLANK ROME LLP**

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes the notices and papers referred to in Bankruptcy Rule 2002, and also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand

¹ The last four digits of FTX Trading Ltd.'s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at https://cases.ra.kroll.com/FTX. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

delivery, telephone, telegraph, facsimile, or otherwise, which affect or seeks to affect in any way the above-captioned Debtor or the property of the Debtor, or any of the rights or interests held or asserted by Fulcrum with respect to the Debtor or property of the Debtor.

PLEASE TAKE FURTHER NOTICE that this request shall not be deemed or construed to be a waiver of any substantive or procedural rights of Fulcrum, including without limitation, to: (a) challenge the jurisdiction of this Court to adjudicate any matter, including, without limitation, any non-core matter; (b) require that where any adversary proceeding is to be initiated against Fulcrum in these cases or any related case or where any proceeding is to be initiated by complaint against Fulcrum under applicable non-bankruptcy law, service shall be made on Fulcrum in accordance with applicable Bankruptcy Rules, the Federal Rules of Civil Procedure, and applicable non-bankruptcy law and that service upon undersigned counsel is insufficient for such purposes; (c) have final orders in non-core matters entered only after de novo review by the United States District Court for the District of Delaware; (d) trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases; (e) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (f) any other rights, claims, actions, defenses, setoffs or recoupments to which Fulcrum is or may be entitled in law or at equity, all of which rights, claims, actions, defenses, setoffs or recoupments Fulcrum expressly reserve and assert.

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Dated: October 24, 2023 Wilmington, Delaware

BLANK ROME LLP

/s/ Josef W. Mintz

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